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MCAS EL TORO
SSIC # 5090.3

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CLEAN II Program
Bechtel Job No. 22214
Contract No. N68711-92-D-4670
File Code: 02221
IN REPLY REFERENCE: CTO-0079/0456

May 5, 1998

Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Richard Selby, Code 57CS1.RS
Building 127, Room 112
1220 Pacific Highway
San Diego, CA 92132-5190

Subject: Response to EPA Comments on the Draft Final Phase II Feasibility Study OU-3A Sites, Marine Corps Air Station, El Toro, California

Dear Mr. Selby:

It is our pleasure to submit this copy of the Response to EPA Comments on Draft Final Phase II Feasibility Study Report for Operable Unit 3A Sites, MCAS El Toro, California, prepared under Contract Task Order (CTO) 0079 and Contract No. N68711-92-D-4670. We gratefully acknowledge the high level of cooperation and team work demonstrated by personnel from MCAS El Toro, Southwest Division, the United States Environmental Protection Agency, California Department of Toxic Substances Control, and Regional Water Quality Control Board - Santa Ana Region, during the execution of this project.

We appreciate the opportunity to be of service to you on this project. If you have any questions or would like further information, please contact me at (619) 687-8780.

Sincerely,

Dante J. Tedaldi, Ph.D., P.E.
Project Manager

DJT/sp

Enclosure: Response to EPA Comments on the Draft Final Phase II Feasibility Study OU-3A Sites

RESPONSE TO COMMENTS
EPA EVALUATION OF MCAS EL TORO RESPONSE TO EPA COMMENTS ON
DRAFT FINAL PHASE II FEASIBILITY STUDY REPORT FOR OU-3A
MCAS EL TORO, CA AND EPA EXTENSION REQUEST

Originator: Glenn R. Kistner, Project Manager U.S. EPA **To:** Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro **Date:** 6 February 1998	**CLEAN II Program** **Contract No. N68-711-92-D-4670** **CTO-0079** **File Code: 0222**
RESPONSES TO COMMENTS	***RESPONSES TO RESPONSES TO COMMENTS***
1. **Executive Summary, Response to Specific Comment 3. Please expand the response to state that Table ES-2 is now Table 1-4 in Section 1, page 1-23.**	**RESPONSE 1:** Table ES-2 was removed from the report to reduce the size of the Executive Summary and because it was already included in the Draft FS report as Table 1-4.
2. **Attachment A, Response to Specific Comment 5. The text did not include fuel, electricity, and water usage or community acceptability. Please refer either the text or the response as appropriate.**	**RESPONSE 2:** The text will be included in updated pages that will be issued shortly.
3. **Attachment A, Response to Specific Comment 7. Since degradation rates are highly variable and dependent on site-specific conditions like aerobic/anaerobic conditions, temperature, microbial population, concentrations of target and other contaminants, the specific phases (soil, water, air) present, etc., please provide a detailed description of how the degradation rates listed in this response were measured or obtained. Also, explicitly cite the study(ies) used as a basis for this response. To ensure concentration changes were not due to sample heterogeneity, the results of replicate analyses should have been included in the study cited. Generally, high concentrations of PAHs are toxic to the organisms, and studies are done on water with low concentrations; the relative concentrations in the soil at El Toro and the media/concentrations used in the study should be carefully compared and described.**	**RESPONSE 3:** The discussion provided in the response to the Attachment A, Specific Comment 7, was referenced from the Draft Final Phase II Remedial Investigation Report OU-3A Sites where the remedial investigation for this site is presented. The values presented in the report and the response to the comments were obtained from literature sources referenced in the remedial investigation report.
4. **Attachment A, Response to Specific Comment 30. The response references the response to Comment 15 of Attachment A. Comment 15 deals with another concern and is not appropriate to the discussion. A more appropriate reference would be to refer to Comment 21 of Attachment A. Please clarify or revise as necessary.**	**RESPONSE 4:** The reference should be the response to Comment 21.

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5. Attachment B, Response to Specific Comment 4. The text did not include fuel, electricity, and water usage or community acceptability. Please refer to either the text or the response as appropriate.	**RESPONSE 5:** The text will be included in update pages that will be issued shortly.
6. Attachment C, Response Specific Comment 1. Please expand the response to the comment. The information cited appears to be for general infiltration of the MCAS El Toro area and may be appropriate for this specific location. However, since the drainage ditch collects and concentrates surface runoff, it is more likely that saturated conditions will exist for longer periods of time in the drainage ditch so infiltration at this location is more likely. The reference cited (< 5 inches/year) may take local variations of infiltration into consideration, but this is not reflected in the response.	**RESPONSE 6:** Attachment C Specific Comment 1 for the Draft FS referenced to the statement "evapotranspiration rates are high and net infiltration from precipitation is low (less than five inches per year)." The comment stated "Please verify that this information is correct for Unit 3 at Site 12. It is likely that evaporation and infiltration along the drainage ditch are higher than at most of the other sites at El Toro." The response to that comment indicated that the information was verified. In summary, the conditions at the Site 12 Unit 3 are as follows: • The soil/sediments present at Unit 3 are comparable to those in the surrounding area of Site 12 as well as Site 8 Units 1 through 4 and Site 11 Units 1 and 2 based on boring logs from the remedial investigation. • Fate and transport analysis presented in Section 5 of the remedial investigation for Site 12 Unit 3 indicated that the contaminants are effectively immobile (>87% sorbed to the soil). • Observations made during storm events over the last four years indicate that accumulation of runoff from surrounding areas does not occur in Unit 3. • Substantial vegetation growth in Unit 3 suggests that significant transpiration occurs.
7. Attachment C, Response to Specific Comment 8. The response should also state that in addition to the resistance to leaching of the COPCs at the site, irrigation would only be necessary to offset excess evapotranspiration. From a groundwater volume perspective, total infiltration should be minimal.	**RESPONSE 7:** Comment noted.

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8. Attachment C, Response to Specific Comment 22. The response references the response to Comment 15, Attachment C. There is no response number 15 for Attachment C.	**RESPONSE 8:** The reference should be the response to Comment 16.
NEW COMMENTS **1. Leaching/Solubility Testing. In the discussion of Alternative 3 in each Attachment (Sections A3.2.1.3, B3.3, and C3.3), it is stated that sampling of the soils would be performed to demonstrate that analyte concentrations do not exceed toxicity characteristic leaching procedure (TCLP), solubility threshold limit concentration (STLC), and total threshold limit concentration (TTLC) regulatory levels, so that the soils could be used as cover material at an on-Station landfill. It was not clear in the document or Response to Comment 6, DTSC, which references the RI for this site, if there has been specific testing to confirm the assumption that the threshold concentrations will not be exceeded. This is a critical point in the evaluation and selection of remedial action Alternative 3 for the three areas. Please confirm if this testing has been done or is planned.**	***RESPONSES TO NEW COMMENTS*** **RESPONSE 1:** This type of testing was not performed as part of the remedial investigation. However, the analytical data obtained during the remedial investigation strongly suggest that the contaminant concentrations in soil at Site 12 would not exceed TCLP, STLC or TTLC levels.
2. Landfill Disposal Options. Section 2.4.2 (Preliminary Evaluation of Technologies and Selection of Representative Process Options) discusses why both on-Station and off-Station Class III landfills were eliminated as disposal options (which were for either regulatory or practical concerns). Please expand on these concerns, especially for on-Station disposal, because without treatment, the two landfill options presented in this FS are: 1) disposal in a Class I landfill, which has the most stringent citing and design requirements; or 2) use as part of the cover of an on-site Class III landfill, which is a much less stringent use. The appropriateness of these two landfilling options would not appear to be consistent to the general public without addition explanation.	**RESPONSE 2:** The four inactive on-Station landfill sites are not Class III landfills and were not referenced as such in the Draft or Draft Final FS documents. On-Station disposal of soil from the OU-3A sites at these four inactive landfill sites was eliminated from consideration in the preliminary evaluation of technologies and process options for the OU-3A sites. In reference to the first landfill option cited in this comment, disposal in an off-Station Class I landfill would only apply to hazardous treatment residuals (materials remaining after incineration of soil or after soil washing). None of the alternatives proposed in the Draft or Draft Final FS recommend disposal of soil in a Class I landfill. In reference to the second option, Alternative 3 for all three OU-3A sites proposes recycling of non-hazardous soil as cover material beneath the proposed caps at on-Station landfill Sites 2 or 17 in

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	conformance with regulatory guidelines for "soil used in a manner constituting disposal".

BECHTEL NATIONAL INC.

DRAFT CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT

Contract No. N-68711-92-D-4670 **Document Control No.:** CTO-0079/0456

File Code: 02221

TO: Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Richard Selby, Code 57CS1.RS
Building 127, Room 112
1220 Pacific Highway
San Diego, CA. 92132-5190

DATE: May 5, 1998
CTO #: 079
LOCATION: MCAS El Toro

FROM: D. J. Tedaldi, Ph.D., P.E., Project Manager

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